

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

ParkerVision, Inc.

Plaintiff,

vs.

Intel Corporation

Defendant.

Civil Action No. 6:20-cv-00108-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF JASON F. CHOY IN SUPPORT OF DEFENDANT INTEL  
CORPORATION'S MOTION TO TRANSFER VENUE UNDER 28 U.S.C. §1404(a)**

I, Jason F. Choy, declare under penalty of perjury that:

1. I am an attorney at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Intel Corporation ("Intel").

2. If sworn as a witness to testify in this matter, I would testify to the facts as set forth herein.

3. Attached as Exhibit 1 is a true and correct copy of ParkerVision, Inc.'s ("ParkerVision") 2019 Form 10-K, filed with the Securities and Exchange Commission ("SEC") on April 14, 2020.

4. Attached as Exhibit 2 is a true and correct copy of a translation of a final judgment of the Munich Regional Court in the matter of ParkerVision GmbH, dated April 25, 2019, File no. 7 O 2141/17.

5. Attached as Exhibit 3 is a true and correct copy of European Patent 1 135 853, obtained from publicly available sources.

6. Attached as Exhibit 4 is a true and correct copy of a translation of a decision on costs and determination of the value in dispute of the Bundespatentgericht [BPatG] [Federal Patent Court], dated December 16, 2019, file number 5 Ni 19/17 (EP).

7. Attached as Exhibit 5 is a true and correct copy of an Apple press release titled “Apple to acquire the majority of Intel’s smartphone modem business” issued on July 25, 2019 and available at <https://www.apple.com/newsroom/2019/07/apple-to-acquire-the-majority-of-intels-smartphone-modem-business/>.

8. Attached as Exhibit 6 is a true and correct copy of a LexisNexis Accurint Report for “Charley Dan Moses Jr.”

9. Attached as Exhibit 7 is a true and correct copy of a LexisNexis Accurint Report for “David Frank Sorrells.”

10. Attached as Exhibit 8 is a true and correct copy of a LexisNexis Accurint Report for “Gregory Scott Rawlins.”

11. Attached as Exhibit 9 is a true and correct copy of a LexisNexis Accurint Report for “Jamison Lynn Young.”

12. Attached as Exhibit 10 is a true and correct copy of a LexisNexis Accurint Report for “Jonathan Scott Jensen.”

13. Attached as Exhibit 11 is a true and correct copy of a LexisNexis Accurint Report for “Martin Robert Johnson Jr.”

14. Attached as Exhibit 12 is a true and correct copy of a LexisNexis Accurint Report for “Michael James Bultman.”

15. Attached as Exhibit 13 is a true and correct copy of a LexisNexis Accurint Report for “Michael Wayne Rawlins.”

16. Attached as Exhibit 14 is a true and correct copy of a LexisNexis Accurint Report for “Richard Clayton Looke.”

17. Attached as Exhibit 15 is a true and correct copy of a LexisNexis Accurint Report for “Robert Townsend Short.”

18. Attached as Exhibit 16 is a true and correct copy of a Westlaw People Map Report for “Robert Cook.”

19. Attached as Exhibit 17 is a true and correct excerpt from the prosecution history of U.S. Patent No. 6,049,706, obtained from publicly available sources.

20. Attached as Exhibit 18 is a true and correct excerpt from the prosecution history of U.S. Patent No. 6,266,518, obtained from publicly available sources.

21. Attached as Exhibit 19 is a true and correct excerpt from the prosecution history of U.S. Patent No. 6,580,902, obtained from publicly available sources.

22. Attached as Exhibit 20 is a true and correct excerpt from the prosecution history of U.S. Patent No. 7,110,444, obtained from publicly available sources.

23. Attached as Exhibit 21 is a true and correct excerpt from the prosecution history of U.S. Patent No. 7,539,474, obtained from publicly available sources.

24. Attached as Exhibit 22 is a true and correct excerpt from the prosecution history of U.S. Patent No. 8,588,725, obtained from publicly available sources.

25. Attached as Exhibit 23 is a true and correct excerpt from the prosecution history of U.S. Patent No. 8,660,513, obtained from publicly available sources.

26. Attached as Exhibit 24 is a true and correct excerpt from the prosecution history of U.S. Patent No. 9,118,528, obtained from publicly available sources.

27. Attached as Exhibit 25 is a true and correct excerpt from the prosecution history of U.S. Patent No. 9,246,736, obtained from publicly available sources.

28. Attached as Exhibit 26 is a true and correct excerpt from the prosecution history of U.S. Patent No. 9,444,673, obtained from publicly available sources.

29. Attached as Exhibit 27 is a true and correct copy of information from Google Maps regarding the distance between Hillsboro, Oregon and the U.S. District Court in Waco, Texas.

30. Attached as Exhibit 28 is a true and correct copy of information from Google Maps regarding the distance between Santa Clara, California and the U.S. District Court in Waco, Texas.

31. Attached as Exhibit 29 is a true and correct copy of information from Google Maps regarding the distance between Cupertino, California and the U.S. District Court in Waco, Texas.

32. Attached as Exhibit 30 is a true and correct copy of information from Google Maps regarding the distance between San Jose, California and the U.S. District Court in Waco, Texas.

33. Attached as Exhibit 31 is a true and correct copy of information from Google Maps regarding the distance between Hillsboro, Oregon and the U.S. District Court in Portland, Oregon.

34. Attached as Exhibit 32 is a true and correct copy of information from Google Maps regarding the distance between Santa Clara, California and the U.S. District Court in Portland, Oregon.

35. Attached as Exhibit 33 is a true and correct copy of information from Google Maps regarding the distance between Cupertino, California and the U.S. District Court in Portland, Oregon.

36. Attached as Exhibit 34 is a true and correct copy of information from Google Maps regarding the distance between San Jose, California and the U.S. District Court in Portland, Oregon.

37. Attached as Exhibit 35 is a true and correct copy of data from Lex Machina regarding the median time to trial in the District of Oregon from January 1, 2000 to July 8, 2020.

38. Attached as Exhibit 36 is a true and correct copy of data from Lex Machina regarding the median time to trial in the Western District of Texas from January 1, 2000 to July 8, 2020.

39. Attached as Exhibit 37 is a true and correct copy of data from Docket Navigator regarding patent cases filed in the Western District of Texas between January 1, 2020 and July 9, 2020 that are assigned to Judge Alan D. Albright.

40. Attached as Exhibit 38 is a true and correct copy of data from Docket Navigator regarding the number of active patent cases in the District of Oregon as of July 10, 2020.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 10, 2020.

/s/ Jason F. Choy

Jason F. Choy